

FEDERAL TANF PROGRAMS

W-2 PROGRAM DELIVERY SYSTEM

Introduction

Wisconsin was notified by the Administration for Children and Families, federal Department of Health and Human Services, that effective September 30, 1996, the state's TANF plan was found to contain the necessary elements to qualify as an "eligible state" for purposes of receiving block grant funding under the TANF program. Wisconsin's plan was designed with the purpose of TANF block grants, described under Section 401 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), as its foundation.

In September 1997, the W-2 program was implemented statewide. The majority of families served under Wisconsin's TANF program, are participants in W-2. During the first six months of implementation, the existing Aid to Families with Dependent Children (AFDC) caseload was transitioned over to W-2, while new applicants were immediately placed into W-2. Since implementation, Wisconsin has seen a further reduction in an already declining caseload of cash recipients, as parents are transitioned into unsubsidized employment.

W-2's success lies in its philosophy that most individuals can become valuable members of the workforce, and all are capable of making some contribution through work. Under W-2, parents are afforded the opportunity to provide for their own family and enjoy the pride inherent in self-reliance. This is accomplished through the provision of short-term education and training coupled with work training activities which are transferable to regular unsubsidized employment.

Community involvement is another key aspect of the W-2 program. Collaboration between employers, community resources, the business community, advocate groups and government programs creates an environment that translates into jobs and positive community involvement for low-income workers statewide. Community Steering Committees are public/private partnerships established under legislation to provide ties to W-2 agencies, with strong leadership from the business sector. They serve as problem-solving boards to the local agencies and collaborate with the Children's Services Network, a one-stop access to all supportive services in the county that benefit children and families.

In the wake of a declining W-2 caseload comes new challenges for Wisconsin. As W-2 agencies continue to transition participants into unsubsidized employment, the remaining caseload is comprised mainly of individuals with more severe barriers to employment. State and local program staff continue to work together to identify the most effective strategies for serving this population.

A 1997 article by Alan M. Hershey and LaDonna A. Pavetti titled "Turning Job Finders into Job Keepers" cited studies that have found between 25 percent and 40 percent of the women who left welfare for work returned to AFDC within a year. Through W-2, Wisconsin seeks to reduce the rate of recidivism by providing the necessary supportive services and financial incentives for low-income parents to gain a foothold in unsubsidized employment. This is particularly important because of the 60-month lifetime eligibility limit. Participants who begin employment may receive child care and transportation assistance, job survival/retention techniques, guidance in making career decisions, and other employment services to help them maintain employment.

The greatest challenge Wisconsin faces is to help families break the intergenerational cycle of welfare. This is being addressed through programs and policies which:

1. Improve the network of employment services available to Wisconsin's job seekers, with special emphasis on those individuals most difficult to serve;
2. Encourage teenagers to begin developing career goals while still in high school; and
3. Instill a greater sense of financial and emotional responsibility in non-custodial parents. W-2 is about more than making a better living; it's about making a better life.

W-2 Program Access

W-2 agencies were awarded W-2 contracts for the period January 1, 2000, through December 31, 2001. There are 72 W-2 Agencies in 79 regions of the state. The agencies include a combination of public and private agencies, selected through a competitive process.

Twelve W-2 Regions are Operated by Six Private Non-Profit Agencies

Forward Services Corporation - Kewaunee; Florence
Forward Services Corporation Consortium – Forest; Oneida; Vilas
Western Wisconsin Private Industry Council – Juneau; Monroe

United Migrant Opportunity Services - Milwaukee County Region II
Opportunities Industrialization Center of Greater Milwaukee - Milwaukee County Region III
Employment Solutions Consortium (Goodwill Industries of Southeastern Wisconsin) - Milwaukee County Region IV and V
Shawano County Job Center - Shawano

Four W-2 Regions are Operated by Four Private For-Profit Agencies

MAXIMUS - Milwaukee County Region VI
Curtis & Associates - Waukesha
Kaiser Group - Walworth
YW Works – Milwaukee County Region I

Sixty-three W-2 Regions are Operated by County/Tribal Agencies

- 57 W-2 agencies are county human/social services agencies including one county consortium acting on behalf of four additional county human/social services agencies.
- 2 W-2 agencies are Tribes: Bad River; Oneida;

In addition, five Tribes developed a TANF plan and are working directly with the federal government: Red Cliff, Stockbridge-Munsee, Potawatomi and Sokaogon, and Lac du Flambeau .

All W-2 agencies are either collocated or electronically linked to Job Centers in each W-2 geographic area. Job Centers provide one-stop shopping for employers to meet workforce needs and for job seekers to obtain career planning, job placement and advancement, and training at the local level. Job Centers are open to all job seekers, including W-2 participants.

Financial and Employment Planner (FEP) Role

The FEP is central to W-2 integrated case management and is the primary individual who performs and/or monitors all case management services for the W-2 participant. This approach allows a simplified process for the participating family and is more likely to help build a supportive relationship between the participant and the FEP.

A FEP provides:

- W-2 eligibility determination
- W-2 employment position placement
- Employability Plan (EP) development
- Case management
- Referrals to the child support agency
- All other support services for a participant in a W-2 employment or work training position

Supportive Services Planner (SSP) Role

An applicant may decide to request only supportive services. If the applicant/participant is not eligible for, or does not request a W-2 employment position, the Supportive Services Planner (SSP) determines eligibility and provides for the delivery of services which may include:

- food stamps
- Medicaid/BadgerCare
- Emergency Assistance
- transportation assistance
- child care
- referrals to the child support agency

W-2 ELIGIBILITY

The primary purpose of W-2 is to prepare eligible parents, who are not job-ready, for unsubsidized employment to help them provide for their families and become self-sufficient members of the community in which they live. There are four categories of individual who may be eligible for services of the W-2 program:

- Custodial parents of minor children may access all W-2 services.
- Non-custodial parents, subject to a support order for a child, may receive case management services.
- Pregnant women, with no other born children, may receive case management services.
- All minor parents are eligible to receive W-2 case management services.

Applicants must meet both nonfinancial and financial eligibility criteria to be considered for a W-2 employment position, a Job Access Loan and certain case management services.

Income Limits

The W-2 group's income must be at or below 115 percent of the federal poverty level.

Asset Limits

The W-2 group's assets cannot exceed \$2,500, excluding the combined equity value of vehicles up to \$10,000 and one home that serves as the homestead.

Cooperation with Child Support

Applicants or participants must cooperate with child support enforcement efforts to be eligible for W-2 services. The determination of whether an applicant is cooperating with child support enforcement efforts is made by the child support agency. An applicant or participant may claim good cause for refusal to cooperate at any time during the application process or once found eligible for W-2 services. It is the W-2 agency's responsibility to make a determination of good cause in each case.

Residency Requirement

W-2 applicants must verify that they are currently residents of Wisconsin. With the exception of migrant workers, W-2 applicants must also demonstrate an intent to continue to reside in the state.

Accessing Other Sources of Income

A W-2 applicant may be required to apply for and accept other public assistance programs or resources that may be available, prior to being determined eligible for W-2 services. Applicants who refuse to cooperate are not eligible for a W-2 employment position or a Job Access Loan.

W-2 PROGRAM TIME LIMITS

60-Month Time-Limited W-2 Payment Policy

Both federal TANF and state W-2 legislation include a 60-month lifetime limit for eligibility. The time-limits were first applied to AFDC recipients participating in the Job Opportunities and Basic Skills (JOBS) program beginning on October 1, 1996. Therefore, the earliest a W-2 participant may reach the 60-month limit will be October 1, 2001. W-2 agencies may extend the time-limits on a case-by-case basis because of circumstances including:

1. The adult W-2 group member is unable to work because of personal disability or incapacitation;
2. The adult W-2 group member has significant limitations to employment;
3. The adult W-2 group member is needed in the home to care for another severely incapacitated group member; or
4. The adult group member has made all appropriate efforts to find work, and is unable to find unsubsidized employment because local labor market conditions preclude a reasonable job opportunity.

24-Month Time Limit for Subsidized Employment Positions

Participation in any W-2 employment and training position category (Trial Job, Community Service Job (CSJ), and W-2 Transition (W-2 T)) is limited to 24 cumulative months. Extensions to the time limits may be granted on a case-by-case basis.

W-2 EMPLOYMENT AND WORK TRAINING FOR CUSTODIAL PARENTS

W-2's goal is to connect parents with appropriate work or work training as soon as possible. This is done by immediate placement in a W-2 employment or work training level:

- Unsubsidized Employment
- Trial Jobs
- CSJs

- W-2 T

A participant enters the highest possible employment or work training level according to ability and is expected to move up to the next appropriate level at the earliest opportunity. Each new placement brings with it increased income and greater family self-sufficiency.

Unsubsidized Employment

Unsubsidized employment is the highest and most desirable level in this employment or work training system. The FEP must first consider unsubsidized employment for any W-2 applicant who has a strong employment history and skills. Individuals may be placed at this level if they are working in unsubsidized employment and do not have barriers to full-time employment, or they are unemployed, but have been assessed as having the capability of obtaining immediate full-time employment. There are no W-2 cash payments for individuals placed at this level and case management services are provided on a voluntary basis.

Case management services for employed individuals placed in Unsubsidized Employment include, but are not limited to:

- Providing guidance in career decision making skills;
- Exploring career options;
- Identifying vocational opportunities;
- Researching training information;
- Creating or updating a resume;
- Developing networking skills;
- Providing referrals to other community resources; and
- Providing job survival/retention techniques.

Case management services for unemployed individuals placed in Unsubsidized Employment include, but are not limited to:

- Providing assistance in creating a financial plan;
- Establishing employment goals;
- Providing information about job openings;
- Improving job interview skills;
- Completing job applications;
- Writing a resume;
- Arranging job interviews with employers; and
- Contacting employers on the individual's behalf.

Follow-Up Case Management Services

Participants who progress from a subsidized employment position to an unsubsidized position receive follow-up case management services for at least 6 months to support job retention. W-2 agencies may provide follow-up case management services beyond the mandatory 6-month period regardless of the individual's income and asset levels.

The case management services may include:

- Employment skills training;
- English-as-a-Second Language classes if the W-2 agency determines that the course will facilitate the individual's efforts to retain employment;

- A course of study meeting the standards for the granting of a declaration of equivalency of high school graduation; or
- Other remedial education courses.

Wisconsin encourages W-2 agencies to provide services beyond the 6-month period to prevent recidivism and ensure employment stability. There is no time limit on these services.

Subsidized Employment and Work Training

If good faith attempts to obtain employment have been unsuccessful, or if the W-2 agency determines that an applicant is not prepared for unsubsidized employment, the applicant may be offered a W-2 work training placement. Individuals placed in one of the three W-2 work training placements, Trial Jobs, CSJs or W-2 T, may be required to continue appropriate ongoing employment search with the assistance of the W-2 agency, while participating in a W-2 work training placement.

Trial Jobs

Trial Jobs are W-2 subsidized work training placements, intended to encourage employers to give permanent opportunities to individuals who appear job ready, but have a weak work history. The W-2 agency contracts with the employer and pays the employer a subsidy (up to \$300 per month) with the expectation that if the W-2 participant performs satisfactorily, the employer will offer that participant permanent employment. The wage subsidy to the employer may be used flexibly at the Trial Job employer's discretion for training, transportation, or as an offset to employment costs.

An individual may participate in a Trial Job for a maximum of three months with an opportunity for a three-month extension in the rare instances where the additional time is needed to assure job readiness. The total number of months an individual may participate at the Trial Job level is 24 months. The Trial Job employer must pay at least the minimum federal or state wage per hour and must pay wages and benefits comparable to those received by regular employees in similarly classified positions for every hour worked.

Community Service Jobs (CSJ)

The CSJ work training placement is for individuals who are determined not ready for immediate regular employment, particularly where attempts to place a participant in an unsubsidized or Trial Job have not succeeded. CSJs are intended to provide participants with an opportunity to develop or improve work habits and skills that are necessary to succeed in any regular job environment, including punctuality, reliability, work social skills (such as learning to get along with co-workers) and the application of a sustained and productive effort. A prorated CSJ placement may be appropriate for individuals who are already working in an unsubsidized job less than 30 hours per week and where attempts to increase the number of hours in their current job or to find additional unsubsidized employment have not succeeded.

CSJ participants are generally expected to participate 40 hours per week - up to 30 hours per week of work training activities and up to 10 hours of education and training. CSJ participants eligible for a prorated CSJ payment are also expected to participate up to 40 hours per week in a combination of hours in their unsubsidized job, work training activities and education and training activities. The participant is assigned CSJ activities that do not interfere with the hours they are expected to work at the unsubsidized job.

An individual is permitted to participate at the CSJ level for no more than 24 months. Each CSJ position may be scheduled for a period of up to six months with an opportunity for a three-month

extension in the rare instances where readiness for regular employment is slow to develop. A monthly CSJ benefit is \$673 with a reduction of \$5.15 for each hour that the participant fails, without good cause, to participate in assigned activities. Prorated CSJ payments are based on the number of hours the participant is assigned to work training:

- 1/3 CSJ: \$230 for up to 10 hours of work training and up to 10 hours of education and training per week.
- 1/2 CSJ: \$341 for 11 to 15 hours of work training and up to 10 hours of education and training per week.
- 2/3 CSJ: \$452 for 16 to 20 hours of work training and up to 10 hours of education and training per week.____

CSJ work training providers are expected to offer real work training opportunities with appropriate supervision within an environment which generally replicates that of regular employment, realizing that job coaching and mentoring may be needed to help the participant succeed.

CSJ participants may be required to participate up to 10 hours per week in education and training activities assigned as part of an Employability Plan. Permissible education and training activities include, but are not limited to:

- A course of study for the granting of a declaration of equivalency of high school graduation;
- Technical college courses and educational courses that provide an employment skill;
- English-as-a-Second-Language; and
- Parenting, life skills, job skills or other adult basic education.

An 18 or 19 year old CSJ participant who has not obtained a high school diploma or a declaration of high school graduation may attend a high school or GED course of study to satisfy, in whole or in part, the required hours of participation in a CSJ.

W-2 Transition (W-2 T)

The W-2 T work training placement is for individuals who have been determined to have multiple barriers to employment and are unable to successfully participate in one of the other W-2 work training placements or unsubsidized employment for reasons such as alcohol or drug abuse; an individual's incapacitation; or the need to remain in the home to care for another W-2 group member who has a severe incapacitation or disability. An individual can participate in a W-2 T position for a maximum of 24 months. This period may be extended on a case-by-case basis by the W-2 agency.

Participants in W-2 T are placed in full-time activity whenever possible. An in-depth assessment is completed with appropriate professionals when necessary. Based on the results of the assessment, which takes into consideration the limits of ability, the participant may be assigned up to 28 hours per week of work training activities and 12 hours per week of education and training. A monthly W-2 T benefit is \$628 with a reduction of \$5.15 for each hour that the participant fails without good cause to participate in assigned activities.

W-2 T work training activities which may be approved by the W-2 agency include:

- Community rehabilitation program - a program that provides directly or facilitates the provision of vocational rehabilitation to individuals with disabilities and that enables an individual with a disability to maximize opportunities for employment;

- Activities similar to a CSJ but with more supervision; and
- Volunteer activity.

Other W-2 T activities which may be approved by the W-2 agency include:

- Alcohol and other drug abuse (AODA) services not covered by Medicaid, including evaluation, detoxification, assessment and treatment programs;
- Mental health activities, as prescribed by an appropriate health care professional;
- Counseling or physical rehabilitation activities;
- Court ordered activities;
- English-as-a-Second Language;
- Activities related to obtaining shelter or retaining safety in a domestic abuse situation or other activities needed to stabilize a family;
- Other activities that the agency determines are consistent with the capabilities of the participant;
- Caring for a family member with an incapacity of such severity that without home care, the incapacitated member's health and well-being would be significantly affected, as determined by the W-2 agency;
- Caring for a family member who is incapacitated to the degree that only marginal employment is attainable; and
- Activities to support the marginal employment and move the family with special needs closer to self-sufficiency (e.g. parenting, life skills classes, activities at the school, etc.).

W-2 T participants may be required to participate up to 12 hours per week in education and training activities assigned as part of an Employability Plan. Permissible education and training activities include, but are not limited to:

- A course of study for the granting of a declaration of equivalency of high school graduation;
- Technical college courses and educational courses that provide an employment skill; and
- Parenting, life skills, job skills or other adult basic education.

Technical College Participation Under CSJ and W-2 T

If the agency determines that an individual is unable to obtain unsubsidized employment without additional training, the participant may be allowed to participate in a technical college education program for a maximum of two years if the agency has determined that the program will likely lead to employment. An individual placed in a CSJ or W-2 T may participate in a technical college education program as part of that placement if all of the following requirements are met:

1. The participant maintains full-time status in the technical college education program, as determined by the technical college the participant attends, and regularly attends all classes;
2. The participant maintains a grade point average of at least 2.0 (or the equivalent, as determined by the technical college); and
3. The participant is employed or engages in work activities under a CSJ or W-2 T for 25 hours per week in addition to class time.

Assistance to Custodial Parent of an Infant

A custodial parent of a child who is 12 weeks old or less and who meets the financial and nonfinancial eligibility requirements for W-2 work training placements may receive a monthly payment of \$673 and will not be required to participate in an employment position unless s/he volunteers to participate. A parent may only receive the custodial parent of an infant benefit if

no other adult member of the custodial parent's W-2 group is participating or eligible to participate in a W-2 work training placement or working in an unsubsidized job.

The custodial parent is eligible for benefits beginning on the date of the child's birth or the W-2 begin date, whichever is later. If the parent is still eligible for W-2 and not able to obtain unsubsidized employment when the child reaches 12 weeks, s/he may be immediately placed in a W-2 work training placement.

Two-Parent Family Participation

W-2 philosophy strongly emphasizes the responsibility both parents have to care for and support their children. The first parent, the parent placed in a W-2 employment position, must participate in up to 40 hours of W-2 activities per week. If the family is also receiving federally funded child care, the other parent must participate in W-2 activities equal to the difference between 55 hours and the number of hours the parent who is placed in the employment position participates in assigned activities per week. The other parent may be assigned to activities including unsubsidized employment, on-the-job training (which is non-W-2 funded) or work training experience. Additional activities above the minimum required may be assigned based on a determination by the FEP that the activities will best prepare the other parent for unsubsidized employment.

The other parent in a two-parent family not receiving federally funded child care may be offered the opportunity to participate in W-2 activities, but participation is not mandatory. If the offer to participate in activities is accepted, the FEP identifies appropriate activities for both parents taking into consideration the schedules of the parents and children in order to accommodate the family's request not to receive child care.

OTHER ELEMENTS OF W-2 WORK-BASED PARTICIPATION

Employability Plan (EP)

An EP outlines employment goals developed jointly by the FEP and the participant. The EP may also identify basic and immediate family needs (food, clothing, shelter, health care, etc.) that are needed before the family can expect to achieve and/or maintain economic self-sufficiency.

Educational Needs Assessment

Agencies must conduct an educational needs assessment for any individual for whom they determine that the appropriate placement is Unsubsidized Employment or a Trial Job. If the individual is in need of basic education, including a course of study meeting the standards established for the granting of a declaration of equivalency of high school graduation, and the individual wishes to pursue basic education, the activity is included in the individual's Employability Plan (EP). Basic education activities identified may include:

- Writing skills;
- Math skills;
- Improving literacy;
- Remedial education;
- HSED/GED preparation classes;
- English-as-a-Second Language (ESL)

W-2 agencies must pay for the basic education services identified in the EP.

W-2 Fact Finding Process

Individuals who believe that an agency decision regarding any component of W-2 (e.g. employment positions, Job Access Loans, Child Care, Emergency Assistance) is incorrect may request a Fact Finding review by the W-2 agency. The W-2 agency must respond by completing an expeditious review of the case to prevent harm to the client in the event of an agency error. The Fact Finding review is an informal process to resolve issues, explain the proposed action or inaction, and permit the petitioner to present information. Each W-2 agency must have at least one individual assigned to complete Fact Finding reviews. The fact finder must be neutral and provide an objective review and decision on the Fact Finding request. W-2 agencies are bound by the Fact Finding decision for a particular case and must comply with the decision within 10 days of the decision date.

A second level of review is completed by the Department of Administration, Division of Hearings and Appeals (DHA) if the applicant or participant petitions the DHA for a review of the W-2 Fact Finding decision. This review is limited to review of the record and the decision of the fact finder. The W-2 agency may also request DHA to review a Fact Finding decision at any time.

If a Fact Finding decision overturns the agency's action of denying W-2 payments, at either level of review, the W-2 agency shall place the individual in the first appropriate employment position. Payment begins on the date the individual begins participation and no retroactive cash payment for the period prior to participation shall be issued. The W-2 agency is required to restore any payments that were improperly calculated, reduced or terminated retroactive to the date of occurrence.

Child Care and W-2 Participation

A single parent placed in a CSJ or W-2 T position cannot be assigned work activities during a period of time s/he is unable to obtain child care for a child under the age of thirteen. However, the participant may be assigned to other activities which may be performed in the home. FEPs must track these participants closely to ensure they are placed in work activities as soon as a child care provider has been located.

An inability to obtain child care must be based on the following reasons:

1. **Formal child care is not available within a reasonable distance from the parent's home or work site.** Formal child care means at least one licensed or certified child care facility with space available for the child for which there is no documentation that the facility would be harmful to the health or safety of the child.

Reasonable distance means no more than 60 minutes travel time one-way, using available transportation, from the parent's home to the child care provider's location to the parent's work site. Travel time may be extended up to 90 minutes one-way if there is a good placement opportunity for the participant AND the participant is willing to enter into this arrangement.

and

2. **Informal child care by a relative or under other arrangements is unavailable or unsuitable.** Informal child care is defined as an arrangement in which the child care provider is neither licensed nor certified. Participants who use this type of arrangement are not eligible for W-2 child care assistance. Informal child care arrangements may be used by any W-2 participant; however, a participant cannot be required to use informal child care.

If the participant fails to demonstrate an inability to obtain child care, s/he must resume W-2 work activities or face payment reductions, or possibly a strike, for nonparticipation.

CASE MANAGEMENT SERVICES

Learnfare Case Management Services

Learnfare is a component of the W-2 program that requires all school age children of W-2 participants to be enrolled in school. Students who are not enrolled in school or who are dropouts, returning dropouts, habitual truants or minor parents are required to participate in case management. Learnfare case management focuses on services to maintain school enrollment, improve school attendance and prepare children for a career. For high school students, Learnfare case management focuses on graduation, career and/or employment planning, job readiness and job seeking/job retention activities. For minor parents, Learnfare case management also focuses on parenting and life skills. A financial penalty may be imposed for not being enrolled in school or not participating in case management, if required to do so. The financial penalty is in the amount of \$50 per month per child, not to exceed \$150 per W-2 group per month. A financial penalty must not be imposed on students who volunteer for case management. The FEP or Learnfare specialist determines if a student and his/her parent had good cause for failing to cooperate with Learnfare case management.

Case Management for Pregnant Women

A pregnant woman whose pregnancy is medically verified and who is both nonfinancially and financially eligible except that she is not a custodial parent of a dependent child is eligible for job search assistance and case management services provided by the W-2 agency. Case management services may include making the appropriate referral to access child care or discussing employment goals for the W-2 group when the child is over 12 weeks. A pregnant woman cannot be required to participate in an employment position until the child is 12 weeks old. There is no penalty for noncooperation with child support for a pregnant woman or while the child is less than 60 days old.

Minor Parent Case Management

Custodial parents are not eligible to participate in a W-2 work training placement until they have reached the age of 18. By eliminating eligibility for cash assistance for a minor, W-2 has created a stronger tie of responsibility to the adult parent and a better opportunity for the minor parent to complete high school and prepare for a career.

A custodial minor parent is eligible, regardless of income, assets, or living arrangement to meet with a FEP, who can provide a minor parent with information about available child care services, high school and school to work preparation, employment and financial planning, family planning services, community resources and eligibility for Medicaid, food stamps and other food and nutrition services.

A minor parent living independently is counseled by the W-2 agency on the importance of living in an adult-supervised living arrangement, beginning with the assumption that the best option is for the minor to live with his or her parent(s). If needed, other living arrangements are discussed, such as living with a kinship care relative. In some cases, the W-2 agency must refer the minor parent to child welfare authorities and advocate for locating a suitable living arrangement.

Non-custodial Parent (NCP) Case Management

W-2 NCP case management is a voluntary program for the unemployed or underemployed NCPs. The W-2 agency may provide job search assistance and employment and training assistance as part of the case management provided to non-custodial parents to facilitate entry into the labor market and increase capacity to make consistent child support payments for the benefit of the minor child(ren). The goal is to enable W-2 custodial parents to become self-sufficient by ensuring regular child support payments in combination with employment. In addition, it is expected that by meeting their financial obligation, non-custodial parents will also demonstrate enhanced contact with, and emotional investment in their children.

In order for a NCP to be eligible for these services, s/he must be under a current child support order or in the process of having one established, and the custodial parent must be a W-2 participant.

OTHER FEATURES OF WISCONSIN'S TANF PROGRAM

Credit Establishment and Credit Repair Assistance

Financial literacy services, which include training on budgeting, obtaining and managing credit and overall money management, are one of the supports W-2 participants need to maintain self-sufficiency. To address this need, W-2 agencies provide or contract with another entity to provide credit establishment and credit repair assistance to W-2 participants to ensure their financial stability.

Job Access Loans

Job Access Loans (JALs) are short-term, no interest loans designed to meet expenses related to obtaining or maintaining employment. JALs are designed for an individual needing assistance because of a discrete financial crisis that cannot be resolved with personal resources and other funding sources are not available. This crisis, if unresolved, could develop into a long-term problem in which the individual may become dependent upon a W-2 employment position. The individual must meet financial and non-financial eligibility conditions under the W-2 program.

The W-2 agency can approve a JAL from \$25 to \$1600. Some examples of appropriate use of JALs include:

- Car loans for purchase of a vehicle or repairs to provide transportation to work or to look for work;
- Fees for obtaining a drivers license;
- Clothing/uniforms for work;
- Rent or security deposits, to prevent eviction and enable the individual to obtain or maintain employment; and
- Self-employment/entrepreneurial activities. As a condition of any self-employment or entrepreneurial loan, the W-2 agency must require a business plan approved by a traditional loan institution or an organization specializing in entrepreneurial efforts, such as the Wisconsin Women's Business Initiative Corporation or the National Foundation for Training Entrepreneurship.

The W-2 agency has sole discretion in determining and authorizing JALs. The loan recipient must develop a repayment plan approved by the W-2 agency. The loan may be paid back in cash or through a combination of cash and volunteer community work.

Emergency Assistance

The Emergency Assistance (EA) program is designed to meet the immediate needs of eligible persons facing a current emergency. The emergency must be due to fire, flood, natural disaster, energy crisis, impending homelessness, or homelessness. EA is intended to avoid destitution of a child and provide living arrangements for the child in a home. It is not necessary for individuals to receive any other forms of public assistance in order to receive EA. W-2 agencies are responsible for administration of EA. However, in Milwaukee, the EA is administered by the Milwaukee County Human Services Agency through a subcontract with the American Red Cross.

An EA group must contain a child under age 18 and a caretaker relative with whom a child is living. Each member of the EA group must be a resident of Wisconsin and a citizen or qualifying alien, as defined under W-2 policy. The amount of the EA payment is the lower of:

- \$150 for each eligible EA group member;
- the amount requested by the group; or
- the total financial need due to the emergency.

The actual amount of necessary unpaid monthly expenses (housing, food, utilities, transportation, medical and child care) is considered when determining the total financial need of the group. If an individual does not agree with the agency's decision regarding EA eligibility or payment amount, a W-2 Fact Finding Review may be requested.

TANF Eligible Food Stamp Recipients

Wisconsin plans to use TANF funds for employment and training services for food stamp recipients who: 1) have income at or below 130 percent of the FPL; 2) are the custodial parents of minor children; and 3) are mandatory participants in the Food Stamp Employment and Training (FSET) program. These individuals will be eligible for the same services provided under W-2 with the exception of a placement in a W-2 employment position (i.e. Trial Job, CSJ, or W-2T). Eligible activities may include job readiness and motivational activities, employment counseling, job seeking skills training, job survival/retention training, life skills training, and short term education and training directly related to employment opportunities.

Community Reinvestment

Under the Wisconsin Works Implementation Contract, agencies may access unspent contract funding to provide Community Reinvestment (CR) activities to TANF eligible families under 200 percent of FPL with no asset test.

W-2 agencies that choose to access the CR funds must submit a plan to the Department outlining how those monies will be used. CR plans must be consistent with the requirements and purposes of TANF, and provide services allowable under TANF. Agencies were also instructed to carefully consider alternative options rather than spending CR funds on activities that would meet the federal definition of "assistance." Consequently, the vast majority of CR activities are not "assistance" as federally defined.

Agencies were allowed to use CR funding to provide services to families already described in the Wisconsin TANF State Plan effective 10/1/98. These plans either sought to provide the full range of TANF activities described in this plan to a broader TANF population (any family below 200 percent of FPL) or initiated activities for the W-2 population that were allowable although not mandated.

Wisconsin intends to authorize CR funding for additional TANF allowable activities such as those outlined by the U.S. Department of Health and Human Services, Administration for Children and Families in the publication, "Helping Families Achieve Self-Sufficiency – A Guide on Funding Services for Children and Families through the TANF Program."

Agencies will use CR funding to provide a broad array of non-monetary services not already described in this plan to families including: support for work activities, housing, transportation, education and training, child care, legal assistance, mental health services, AODA services, domestic abuse services, local telephone service, developmental and learning disabilities services, child welfare, family formation and pregnancy prevention activities, youth and employer services, and respite care. CR donations will be made to clothing providers, food pantries, and other community resources aimed at improving job readiness, retention and advancement for TANF families. These activities do not duplicate services already available in the geographic region and will otherwise be provided in accordance with the TANF final regulations.

Examples of services provided using CR funding to enhance or supplement the family income or assets include programs such as: small business loans, Individual Development Accounts, job retention bonuses, job and school retention attendance bonuses, family development accounts, entrepreneurial programs, quick start loans, and other Community Reinvestment loans and grants.